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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

JIANLIANG ZHU,

Plaintiff,

v.

MICHAEL CHERTOFF, Secretary of the  
 Department of Homeland Security;  
 CHRISTINA POULOS, Director,  
 California Service Center, U.S.C.I.S.;  
 CONDOLEEZZA RICE, Secretary of State,

Defendants.

No. C 08-0304 JCS

**STIPULATION TO EXTEND DATES;  
 and [PROPOSED] ORDER**

Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Plaintiff filed this action on January 16, 2007 asking this Court to direct the United States Citizenship and Immigration Services (USCIS) and the Department of State to adjudicate his I-824 application, and issue an immigrant visa to his son.

2. Pursuant to this Court's January 16, 2007 Order Setting Initial Case Management Conference, the parties are required to file a joint case management statement on April 18, 2008 and attend a case management conference on April 25, 2008.

3. In order to allow sufficient time for USCIS and the Department of State to answer and

1 prepare a joint case management statement, and possibly administratively resolve the case, the  
2 parties hereby respectfully ask this Court to extend the dates in the Court's scheduling order as  
3 follows:

4	Last day to file Defendants' Answer:	April 11, 2008
5	Last day to file Joint ADR Certification:	April 18, 2008
6	Last day to file/serve Joint Case Management Statement:	May 2, 2008
7	Case Management Conference:	May 9, 2008, at 1:30 p.m.

8 Date: March 21, 2008

Respectfully submitted,

9 JOSEPH P. RUSSONIELLO  
10 United States Attorney

11 \_\_\_\_\_/s/  
12 EDWARD A. OLSEN  
13 Assistant United States Attorney  
14 Attorneys for Defendants

15 Date: March 20, 2008

16 \_\_\_\_\_/s/  
17 JUSTIN X. WANG  
18 Attorney for Plaintiff

19 **ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

20 Date: March 24, 2008

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22 JOSEPH C. SPERO  
23 United States District Judge  
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